Supreme Court, U.S.
FILED
MAR 25 1991
OFFICE OF THE CLERK

(4)

No. 90-1397

SUPREME COURT OF THE UNITED STATES
OCTOBER TERM, 1990

IN RE JONATHAN B. AINSWORTH,

Petitioner

V.

CALIFORNIA STATE SUPREME COURT,

STATE BAR OF CALIFORNIA

Respondents

AMMENDED SUPPLEMENTAL BRIEF FOR PETITION FOR A WRIT OF MANDAMUS, OR IN THE ALTERNATIVE FOR A WRIT OF PROHIBITION, PURSUANT TO 28 U.S.C. SECTION 1651

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Petitioner
In Propria Persona

SUPREME COURT OF THE UNITED STATES

JONATHAN B. AINSWORTH PETITIONER	NO. 90-1397 AMENDED SUPPLEMENTAL BRIEF FOR
VS.	PETITION FOR A WRIT OF
THE SUPREME COURT OF CALIFORNIA, THE STATE BAR OF CALIFORNIA, RESPONDENTS	MANDAMUS, OR IN THE ALTERNATIVE FOR A WRIT OF PROHIBITION, PURSUANT TO 28 U.S.C. SECTION 1651

QUESTIONS PRESENTED:

Petitioner, Jonathan Ainsworth, hereby applies to the U.S. Supreme Court for attorneys' fees, damages, interest and costs pursuant to 18 USC 3006A and 28 USC 1927, plus a "lodestar" multiplier pursuant to Hensley v Eckerhart 103 S.Ct. 1933.

This petitioner had been awarded a court-appointed attorney by the State Bar Court of California. Said attorney was deliberately taken away without due process, in violation of both California

State law as well as in violation of United States Supreme Court precedent in Gideon v Wainwright 372 U.S. 335. Payment by respondents of the attorneys' fees that were incurred by this petitioner, which he could not pay, and which they knew he could not pay, should now be authorized and so ordered by the United States Supreme Court pursuant to 18 USC 3006A as well as by 28 USC 1927 as well as otherwise and according to the authority that follows:

1. 28 USC 1915 and 1746 regard proceeding in forma pauperis. This petitioner has been forced to represent himself in pro per because his court-appointed attorney in the State Bar proceedings was summarily taken away from him without due process, in violation of both

California law, the United States Constitution, as well as United States Supreme Court precedent in Gideon v Wainwright 372 U.S. 335! This has created enormous debts for this petitioner who was only able to retain counsel to represent him for a time, all of whom quit for financial considerations! This petitioner was forced to defend himself without his court-ordered appointed attorney, despite the State Bar Court's earlier order appointing counsel! This petitioner should be compensated for the arbitrary and capricious actions of the California State Bar, and of the California State Supreme Court in allowing this, as well as the acts of the State Bar of California's

prosecutor in doing these acts! Since these are all agencies or agents of the State of California, the award should be against the State of California as well! 18 USC 3006A, as well as U.S. Supreme Court Rule 39.7, as well as the additional authority presented herein, state the authority which the United States Supreme Court may use in awarding such sums as attorneys' fees, damages, interest and costs. The U.S. Supreme Court may also in its discretion, use a "lodestar" multiplier, if it wishes, pursuant to Hensley v Eckerhart 103 S.Ct. 1933.

2. 28 USC 1927 states that this Court has the power to award attorneys' fees incurred as a result of

unreasonable and vexatious delay or multiplication of proceedings. None of these matters need ever have come to the attention of the United States Supreme Court if the State of California, the Supreme Court of California and the State Bar of California had simply corrected their mistakes and "confessed error" as in Young v United States 315 U.S. 257; Petite v United States 361 U.S. 529; Sibron v New York 392 U.S. 40.

28 USC 1927 reads:

> "Any attorney or other person" admitted to conduct cases in any court of the United States or any Territory thereof who so multiplies the proceedings in any case unreasonably and vexatiously may be required by the Court to satisfy personally the extra costs, expenses,

and attorneys fees reasonably incurred because of such conduct."

Clearly the State Bar of California's prosecutor, Jerome Fishkin, as well as the other attorneys for the State Bar, are guilty of such prosecutorial abuses for several reasons, and the case law shows that his client, the State of California as well as the State Bar of California, are likewise responsible financially for his actions. Among the most extreme abuses are the following: they should never have brought two alleged charges of conversion of chattels when they had copies of the bills of sale for said chattels! These are in addition to other obvious and extreme abuses that are

detailed below. The State Bar's Prosecutor, Jerome Fishkin, even went so far as to bring the completely unfounded charges, with the State Bar's and the California Supreme Court's acquiescence, even though the State Bar even hired a handwriting expert who said he could not dispute the genuineness of the signature on the bill of sale that we know he was asked to examine. The handwriting expert's report on the other document, if such a report existed, was never disclosed! It is not known what said expert's conclusion, if any, was regarding the second bill of sale; however, the State Bar Prosecutor waited until the middle of trial to dismiss the second alleged charges of

conversion. The case law will likewise show that this is no excuse and an award of attorneys' fees and damages is clearly warranted under the case law, as will be shown. Ginter v Texas Commerce Bank 111 F.R.D. 615.

All of this, as well as other factors that will be shown, deliberately caused a "multiplication of proceedings" "unreasonably and vexatiously" within the clear meaning of the above law. As such, this Court may award this petitioner his attorneys' fees and damages as well as his interest and costs!

The assessment of attorneys' fees may be made against the client, here the State of California, the

State Bar of California as well as the attorney here, Jerome Fishkin! Lipsig v National Student Marketing Corp. 663 F2d 178,214 (D.C. Circuit; Dreiling v Pugeot Motors of America 850 F2d 1373.

Bad faith on the part of the guilty attorney is sufficient to justify such an award of attorneys' fees even though it need not be shown! Williams v Giant Eagle Markets, Inc. 883 F2d 1184.

This court need not even find that the attorney, here the State Bar's Prosecutor, acted with malice (even though it is clearly shown in the present case)! Knorr Brake Corp. v Harbill, Inc. 738 F2d 223.

The case law goes on to show that it is not even a defense that some of the alleged charges were later dropped! The mere filing of unfounded charges is sufficient to warrant the imposition of an award of attorneys' fees! Ginter v Texas Commerce Bank 111 F.R.D. 615.

Additional examples of bad faith by both the Supreme Court of California, as well as by the State Bar of California's unbridled Prosecutor follow, even though it is not necessary to show bad faith to warrant an award of attorneys' fees as the above case law proves.

In the present case both the Supreme Court of California and the State Bar of California should have "confessed error" long ago!

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1. The first obvious jurisdictional abuse has three separate subparts. It resulted when the California State Supreme Court knowingly, willfully and deliberately usurped the exclusive jurisdiction of the Iran-U.S. Claims Tribunal and completely ignored said Tribunal's findings that a certain Iranian individual did not have standing to represent a certain "Iranian Government controlled entity" and hence, the alleged complaining witnesses did not even have standing to file a complaint against this petitioner in the first place! In the second place, neither the California State Bar nor the California Supreme Court had jurisdiction to consider the alleged complaint which concerned the Iran-U.S. Claims Tribunal which had exclusive jurisdiction. In the third place, both Respondents erroneously concluded, using deliberately falsified information, that Hassan Has-

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chemi in fact owned Tchacosh, a fact which was completely disproved by the official judgment of the Iran-United States Claims Tribunal which had exclusive jurisdiction to decide all matters that concerned any Iranian government "controlled entity," and therefore both the California State Bar as well as the California State Supreme Court acted totally without any jurisdiction in this matter!

The Iran-U.S. Claims Tribunal decided in Rexnord v Tchacosh, et al, published in The Iranian Assets Litigation Reporter at p 5959 (available at the Library of Congress) that Tchacosh was "controlled" by the Islamic Republic of Iran! (The California Supreme Court erroneously found otherwise!) Applying the correct decision of the correct court that had exclusive jurisdiction according to President Carter's Executive Agreement that established the Court and according to the U.S. Supreme Court in Dames and Moore v Regan 453 U.S. 654, the United States District Court in Los Angeles threw Hassan Haschemi out of court as an impostor! The California Supreme Court and the State Bar of California erroneously ruled contrary to this, erroneously saying that Hassan Haschemi was the owner and thus not an impostor and erroneously concluding that Hassan Haschemi's attorney, Stephen Miller had authority on behalf of Tchacosh to file a complaint with the State Bar of California against this petitioner! Clearly both conclusions were incorrect! The decision of the

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U.S. District Court that threw Hassan Haschemi out of court as an impostor was affirmed by the United States Court of Appeals for the Ninth Circuit. (Please See Tchacosh v Rockwell 766 F2d 1333.) The California Supreme Court and the State Bar of California once again found contrary to this, completely usurping the exclusive jurisdiction of the Iran-U.S. Claims Tribunal that had been granted by Presidential Executive Agreement which had been upheld by the United Supreme Court in Dames and Moore v Regan 453 U.S 654.

2. The second obvious jurisdictional abuse which the State Bar of California still refuses to correct is the actual hiring of the "Compensated Referee" by the State Bar to decide cases in its favor, despite the obvious conflict of interests! This practice has also been outlawed by the United States Supreme Court, yet the California State Bar and the California State Supreme Court still persist and still adamantly refuse to change it! (Please see Wong Yang Sun v McGrath 339 U.S. 33 70 S. Ct. 445 in which the U.S. Supreme Court specifically outlawed this practice!) This obvious abuse has also incurred the scorn of the California State Attorney General's Office, which recognized it as clearly a conflict of interests!

3. The third obvious jurisdictional abuse which the State of California Supreme Court and the State Bar of California committed was in allowing a

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single judge when three judges were explicitly required by law! (Please see California State Bar Court Rule 558.) This specifically violated the principles announced and upheld by the United States Supreme Court in Ex Parte Northern Railway Company 280 U.S. 142; Ex Parte Cogdell 342 U.S. 163; Ex Parte metropolitan Water Company of West Virginia 220 U.S. 539, and numerous other cases that were cited in the petition! All of the cases cited are U.S. Supreme Court cases and all were deliberately ignored by both the California Supreme Court and by the State Bar of California and by the Prosecutor, all of whom continued to act in and with complete bad faith in failing and refusing to "confess error" and to reinstate this petitioner as a member in good standing of the California State Bar Association! This warrants an increased multiplier in the award of attorney fees, damages and interests pursuant to Hensley v Eckerhart 103 S.Ct. 1933 !

QUESTION FOUR:

IN DELIBERATELY CONVICTING THIS PETITIONER DESPITE HIS U.S. CONSTITUTIONAL SAFEGUARDS WHICH WERE TRAMPLED UPON AND IN ALLOWING IT, THE STATE BAR OF CALIFORNIA AND THE CALIFORNIA STATE SUPREME COURT AND THEIR ATTORNEYS ACTED WILLFULLY, DELIBERATELY AND MALICIOUSLY IN ORDER TO REMOVE PRESSURE THAT IT WAS THEN RECEIVING FROM THE CALIFORNIA STATE LEGISLATURE AND FROM A NEWSPAPER![4]

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4. This petitioner documented the pretrial publicity and political pressure that were brought to bear on the California State Bar Association and the California Supreme Court by the "yellow journalistic" San Francisco Examiner newspaper and by the California Legislature! For these judicial bodies to abandon their former regard for United States Supreme Court precedents and constitutional rights because of this political pressure and pretrial publicity is unfathomable! Rideau v Louisiana 373 U.S. 723 and Chandler v Florida 449 U.S. 560 are U.S. Supreme

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Court cases which overturned convictions that resulted from pretrial publicity just as in the present case!

District of Columbia Federation of Civic Associations v Volpe 459 F2d 1231; Eastern Airlines v CAB 271 F2d 752; Pillsbury v FTC 354 F2d 298; and Sicoma Club v Castle 657 F2d 298 are U.S. Supreme Court cases which overturned cases whose outcomes had resulted from "legislative prodding," as in the present case!

The State Bar of California's and the California Supreme Court's and their attorneys' unreasonable actions in deliberately and totally ignoring the above U.S. Supreme Court precedents willfully and deliberately caused "a multiplicity of actions," as the term is used in 28 USC 1927, because each of the above-mentioned respondents and their attorneys unreasonably gave into the political pressures that emanated from the newspaper and from the California State Legislature, which were documented by quotes from the WETA television documentary, quoted in this petitioner's application for a writ of mandumas or in the alternative for a writ of prohibition.

QUESTION FIVE:

IN UNCONSTITUTIONALLY ADDING NEW CHARGES DURING TRIAL AND PERMITTING IT DESPITE OBVIOUS UNITED STATES SUPREME COURT CASES WHICH PROHIBIT THIS PRACTICE, THE STATE BAR OF CALIFORNIA AND THE CALIFORNIA STATE SUPREME COURT AND THEIR ATTORNEYS ARE GUILTY OF DELIBERATE OPPRESSION, FRAUD AND MALICE![5]

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5. Both the Supreme Court of California as well as the State Bar of California willfully and deliberately ignored the following United States Supreme Court cases: In Re Ruffalo 390 U.S. 644 and Cole v Arkansas 333 U.S. 196, when they unreasonably, deliberately and capriciously added and allowed to be added completely new charges during the trial itself! This proved complete bad faith on their parts and attorneys' fees, damages, cost, and interest are clearly indicated!

QUESTION SIX:

IN ACTUALLY COACHING WITNESSES TO DELIBERATELY MISLEAD THIS PETITIONER INTO BELIEVING THAT MOST OF THE MAJOR ALLEGED CHARGES AGAINST HIM HAD BEEN DISMISSED IN ORDER TO WILLFULLY AND DELIBERATELY TRICK THIS PETITIONER INTO NOT PREPARING ANY DEFENSE TO THESE ALLEGED CHARGES WHATSOEVER AND IN TOLERATING IT, THE STATE BAR OF CALIFORNIA AND THE CALIFORNIA STATE SUPREME COURT AND THEIR ATTORNEYS ARE GUILTY OF OPPRESSION, FRAUD, MALICE, AS WELL AS EXTREME BAD FAITH![6]

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6. These overt acts by the California Bar's Prosecutor which were admitted to at trial, were not only tolerated but were even "winked at" by the State Bar's "Compensated Referee" and by California State Supreme Court,which didn't seem to mind these obvious abuses,despite the fact that in United States Supreme Court previously condemned this practice in United States v Throckmorton 98 U.S. 61; and in Hazel Atlas Glass v Hartford 322

QUESTION SEVEN:

IN DELIBERATELY IGNORING THE EXPLICIT STATUTES OF LIMITATIONS FOR ALMOST ALL OF THE ALLEGED CHARGES, THE STATE BAR OF CALIFORNIA AND THE CALIFORNIA SUPREME COURT AND THEIR ATTORNEYS ARE GUILTY OF EXTREME OPPRESSION, FRAUD AND MALICE![7]

U.S. 328. This clearly and obviously justifies an award of attorneys' fees, damages, interests and costs against each of the respondents and each of their individual attorneys!

7. Both the California State Supreme Court and the State Bar of California and their attorneys deliberately, willfully, and maliciously ignored the applicable statutes of limitations for most of the alleged charges, despite the fact that this was pointed out to them on numerous occasions! This was in clear violation of the United States Supreme Court's holding in Schiavone v Fortune 477 U.S. 21.

QUESTION EIGHT:

IN DELIBERATELY DENYING THIS PETITIONER HIS CONSTITUTIONAL RIGHT TO CONFRONT THE ALLEGED WITNESSES AGAINST HIM, THE CALIFORNIA SUPREME COURT AND THE STATE BAR OF CALIFORNIA AND THEIR ATTORNEYS ARE GUILTY OF OPPRESSION, FRAUD, MALICE AND EXTREME BAD FAITH![8]

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8. In Pointer v Texas 380 U.S. 400; Ohio v Roberts 448 U.S. 56; California v Green 399 U.S. 149; Dutton v Evans 400 U.S. 74, the United States Supreme Court reiterated the constitutional right to confront and cross-examine the alleged witnesses against an accused! Once again this right was denied this petitioner on numerous occasions and several so-called "complaining witnesses" even failed to appear at the trial at all! This did not prevent the State Bar's Prosecutor from giving his own alleged testimony in their place! "Trial," if it could even be called a "trial," was by surmisal and conjecture! The State Bar Prosecutor in effect even testified himself, according to what he said that these witness would have said had they appeared at all, i.e. he really said whatever he wanted without any showing of unavailability of the absent alleged witnesses and completely without

QUESTION NINE:

IN DELIBERATELY VOIDING CONTRACTS BETWEEN AND AMONG MOST OF THE ALLEGED COMPLAINING WITNESSES AND THIS PETITIONER AND BY ALLOWING IT, WHEREIN THE ALLEGED COMPLAINING WITNESSES HAD AGREED IN WRITING TO AN OUTRIGHT DISMISSAL OF THEIR ALLEGED COMPLAINTS AGAINST THIS PETITIONER, THE STATE BAR OF CALIFORNIA AND THE STATE SUPREME COURT OF CALIFORNIA AND THEIR ATTORNEYS, WERE GUILTY OF EXTREME BAD FAITH, AND AS

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any showing of any prior statements by the alleged witnesses whatsoever! The State Bar's Prosecutor even went so far as to give medical testimony that he said his alleged medical expert would have given had he appeared! This is only one of many, many completely outrageous examples!

In doing these acts and allowing them, both the State Bar of California and the California Supreme Court were guilty of overt and obvious oppression, fraud and malice!

SUCH SHOULD BE MADE TO PAY ATTORNEYS' FEES, INTEREST, COSTS AND DAMAGES.[9]

QUESTION TEN:

IN WILLFULLY AND KNOWINGLY ACTING IN AN OBVIOUS UNCONSTITUTIONAL MANNER TO DEPRIVE THIS PETITIONER OF HIS SIXTH AMENDMENT RIGHT TO COUNSEL, IN CLEAR VIOLATION OF GIDEON V WAINWRIGHT 371

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9. The Contract Clause of the U.S. Constitution, Article 1 Section 10, specifically prohibits voiding contracts such as the contracts that involved this petitioner and most of the alleged complaining witnesses in which most of the alleged complaining witnesses agreed in writing to dismiss their alleged complaints! Fletcher v Peck 10 U.S. (Cranch) 87 and Home Building and Loan Association v Beaisdell 290 U.S. 398, are the leading United States Supreme Court cases reaffirming the constitutional right of citizens against state action which "impairs" the right of contract, as both the California State Supreme Court and the California State Bar did in the present case, as was previously shown in the petition!

U.S. 335 AND BY ALLOWING IT, AS WELL AS BY NUMEROUS OTHER EXTREME EXAMPLES, THE STATE BAR OF CALIFORNIA AND THE CALIFORNIA SUPREME COURT AND THEIR ATTORNEYS ACTED WILLFULLY, DELIBERATELY AND MALICIOUSLY![10]

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10. The unconscionable way the California Supreme Court and the State Bar of California denied petitioner his Sixth Amendment Constitutional right to an attorney, after an attorney had been ordered to be appointed but was never appointed, then summarily taken away with less than six days notice, which was never sent to said attorney, and when the explicit California law provided a minimum of 15 days notice plus an additional 5 days when mailed, for a minimum of 20 days notice, has been adequately documented.

In doing the above acts and in tolerating them, the State Bar of California and the California State Supreme Court acted unreasonably, to say the least. An award of attorney's fees, damages, interest and costs is clearly warranted!

QUESTIONS ELEVEN AND TWELVE:

IN BRINGING TWO SEPARATE CLAIMS FOR ALLEGED CONVERSION OF CHATTELS EVEN THOUGH IT HAD COPIES OF THE BILLS OF SALE IN BOTH SEPARATE CLAIMS AS WELL AS AN AUTHENTICATED SIGNATURE FROM THE STATE BAR OF CALIFORNIA'S OWN HANDWRITING EXPERT AND BY ALLOWING IT, AS WELL AS BY NUMEROUS OTHER OBVIOUS ABUSES, THE STATE BAR OF CALIFORNIA AND THE CALIFORNIA STATE SUPREME COURT AND THEIR ATTORNEYS WILLFULLY, KNOWINGLY AND DELIBERATELY COMMITTED EXTREME BAD FAITH![11, 12]

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11. , 12 The State Bar of California and its arrogant and completely biased prosecutor even brought two completely unfounded charges that alleged conversion of chattels, even though it had in its possession two separate bills of sale by which the clients had conveyed title to the chattels to the attorney! The State Bar Prosecutor later withdrew one charge during the course of the Mayes-Ulricksen hearing, after Mayes-

CONCLUSION:

The above statutes, 28 USC 1915, 1746 and 1927 clearly warrant the imposition of an award of attorneys' fees against all of respondents, as well as their attorneys, who willfully and wantonly, deliberately and maliciously withheld vital information (many of the alleged complaining witness' statements as well as other information) that could

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Ulricksen had testified, yet the State Bar of California ordered Mayes-Ulricksen to be paid the value of the old car from the client security fund, despite the obvious inconsistency! The California State Bar Prosecutor and the California State Bar likewise prosecuted this petitioner despite its own handwriting expert's written testimony that one alleged complaining witnesses' signature on the bill of sale for his old boat was not contrived! The State Bar's "Compensated Referee" then buried his finding that there was no conversion in the transcript! The withdrawing of an unfounded charge is no defense and attorney's "fees may be awarded Ginter v Texas Commerce Bank 111 F.R.D. 615

have exculpated this petitioner at an earlier date, and even went so far as to deliberately commit the other extreme acts of malice, fraud and oppression as indicated! Indeed, the prosecution is still deliberately withholding information and evidence in the Haschemi/Miller and Ghasemloo matters, i.e., the alleged complaining witness' alleged complaint reports which they continue to refuse to divulge!

None of the above matters were mistakes! The prosecution and the other attorneys for the State Bar of California knowingly, willfully and deliberately used perjured information in the Haschemi/Miller, Ghasemloo and in other matters, as indicated in the petition, and willfully and deliberately filed alleged charges well beyond the

applicable statues of limitations and also deliberately coached the complaining witnesses to tell this petitioner in writing that most if the charges had been dismissed so that he would not prepare a defense, also willfully and deliberately changed charges during the trial itself in the Haschemi, Ghasemloo and Phyillaier matters and even went as far as to prosecute this petitioner in the Mayes-Ulrickson and Phyilliaer matters even though it had copies of the bills of sale that disproved the alleged charges of conversion, etc.

Immediate disbarment for the prosecutor should also be appropriate!

In each and every one of the above matters the State Bar and its prosecutors showed complete and utter

disrespect for the law! They engaged in a witch hunt reminiscent of Salem, Massachusetts. The California State Supreme Court allowed and tolerated these numerous constitutional abuses!

Attorney's fees in the amount of $1,600,000 with a lodestar multiplier are requested. (Please see Declaration attached).

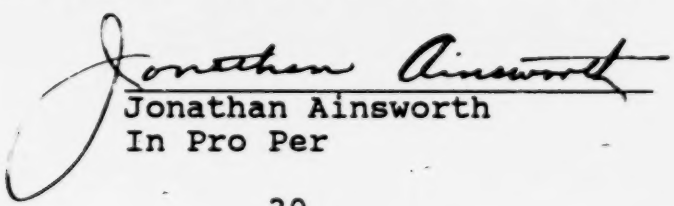
Also, in regard to damages, the U.S. Supreme Court should award at least an additional $5,000,000 to $25,000,000 in additional damages against each of the respondents, as well as the State of California and each of the respondents' willful and deliberate nefarious attorneys, in order to compensate this petitioner for the extreme damage to his reputation. This petitioner is from a family of attorneys and one of his

relatives was well-known to almost all of the individual Justices of the U.S. Supreme Court. Known for his integrity, this judge drafted the code of ethics for all federal judges and was Chairman of the federal judiciary's Ethics Committee and the Administrative Practices Committee. The damage and severe injury to this petitioner and to this petitioner's family were enormous!

This Court, in its discretion, should award this petitioner at least an additional $5,000,000 in damages. An additional award of an additional $25,000,000 in damages would not be unreasonable under the circumstances! In this day and age, prosecutorial abuses should be made to cease! The extreme damages to this petitioner's entire family that was caused by the

completely unfounded and scurrilous decision being published and disbursed to public and private law libraries throughout the entire United States and abroad could only be remedied by a proper opinion of this Court and a substantial award of attorney's fees, damages, interest and costs against the following: 1. The State of California, 2. The State Bar of California, a division of the State of California., 3. The California Supreme Court, 4. Jerome Fishkin, Attorney for the State Bar, 5. Attorneys for the State Bar, Diane C. Yu, Truitt Richey, Gael Infande Weiss, 6. Each and every other attorney for respondents!

Respectfully submitted March 21, 1991.



Jonathan Ainsworth
In Pro Per

Declaration of Jonathan Ainsworth in Support of Application for Attorneys' Fees

I, Jonathan Ainsworth, declare as follows:

I request 50% of my total billable hours for the last five years be paid to me as attorneys' fees with at least a 150% lodestar factor increase. Damages is a separate subject which will be discussed at the end of this declaration. The hours I expended are as follows:

1986 - 50% of part of the year

1987 - 50% of all of the year

1988 - 50% of all of the year

1989 - 50% of all of the year

1990 - 50% of all of the year

1991 - 50% of part of the year

1987, 1988 - $100,000 in out-of-pocket attorneys' fees paid to other lawyers

The work included the following: a "trial" that lasted over two weeks in which I was forced and compelled to defend myself, without an attorney, despite the fact that one had been ordered appointed by the State Bar Court then summarily and erroneously taken away from me without proper notice to either an appointed attorney or to me, over my strenuous objection! Many, many, many pretrial and post trial motions, legal briefs, applications and petitions to the California State Supreme Court were performed, numerous letters to the individual Justices of the California State Supreme Court were

sent that complain of the willful, deliberate and outrageous conduct of the State Bar's Prosecutor, the State Bar's "Compensated Referee" and attorney Stephen Miller, who I proved to the California Supreme Court actually perjured himself under oath! (As well as other perjury and outright and deliberate acts of willful bad faith previously mentioned.) The Supreme Court of California and the State Bar of California willfully, wantonly and deliberately failed and refused and still continue to fail and refuse to even answer said correspondence or even to investigate at all, despite numerous items of documentation!

I request my billing rate of $200 per hour be granted me for a total of 5,000 billable hours over the past five

years. This equals $1,000,000, which should be multiplied by a lodestar factor of at least 1.5 which gives $1,500,000, plus out-of-pocket attorneys' fees which are approximately $100,000 in out-of-pocket fees to date! This gives a total of at least $1,600,000, plus costs, interest and damages, and even more if the U.S. Supreme Court believes a lodestar factor greater than 1.5 is warranted! Hensley v Eckerhart 103 S.Ct. 1933. These amounts are approximate. More detailed figures can be supplied if the Court in its discretion deems is appropriate.

An award of at least $5,000,000 in additional damages is clearly indicated and an award of $25,000,000 in additional damages would be more clearly appropriate.

These amounts should be awarded against the following:

1. The State of California
2. The Supreme Court of California
3. The State Bar of California
4. Jerome Fishkin, Attorney for the State Bar
5, Attorneys for the State Bar Diane C. Yu, Truitt Richey, Gael Infande Weiss
6. Each and every other attorney for respondents.

I declare under penalty of perjury that the above is true and correct. Executed March 21, 1991, at Baton Rouge, Louisiana.

Jonathan Ainsworth
In Pro Per